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 19  
**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

20  
 21 IN RE: UBER TECHNOLOGIES, INC.,  
 22 PASSENGER SEXUAL ASSAULT  
 23 LITIGATION

24 MDL No. 3084 CRB

25  
**NOTICE OF MOTION AND MOTION TO**  
**WITHDRAW AS COUNSEL FOR**  
**PLAINTIFF C.L.**

26 This Document Relates to:

27 Honorable Charles R. Breyer

28 *C.L. v. Uber Technologies, Inc., et al;*  
 3:25-cv-00007-CRB

29  
**NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR**  
**PLAINTIFF C.L.**

30  
 31 TO ALL PARTIES AND THEIR COUNSEL OF RECORD, PLEASE TAKE NOTICE  
 32 that as soon hereafter as the matter may be heard, Peiffer Wolf Carr Kane Conway and Wise,  
 33 LLP (“Peiffer Wolf”), counsel of record for Plaintiff C.L. (“Plaintiff”), moves this Court for an  
 34 order permitting its withdrawal as counsel for Plaintiff.

35  
 36 This Motion is made pursuant to Local Rule 11-5(a) and C. This Notice of Motion &  
 37 Motion is based on the below Memorandum in Support and the accompanying Declaration of  
 38 Rachel B. Abrams (“Decl.”), attached hereto as Exhibit A. A Proposed Order is attached as  
 Exhibit B.

1                   **MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

2                   Pursuant to Local Civil Rule 11-5(a) and California Rules of Professional Conduct  
 3 1.16(b)(4) and 1.16(d), Peiffer Wolf submits this Memorandum of Law in support of its Motion  
 4 to Withdraw as Counsel for Plaintiff C.L. Peiffer Wolf respectfully requests the Court grant the  
 5 Motion.

6                   **STATEMENT OF FACTS**

7                   Peiffer Wolf should be permitted to withdraw as counsel for Plaintiff. An attorney may  
 8 withdraw from a case by obtaining an order from the court after reasonable advance written notice  
 9 has been provided to the client and to all other parties. Civ. L.R. 11-5(a); *see also* Cal. Rules Prof.  
 10 Conduct 1.16(d)(1).

11                  After numerous contact attempts, Peiffer Wolf gave appropriate advance notice of its  
 12 intent to withdraw to Plaintiff on October 1, 2025, with final notice on October 8, 2025. Decl. ¶¶  
 13 5(j). Peiffer Wolf has also gave Uber advance notice. Decl. ¶ 7. Peiffer Wolf has taken all possible  
 14 steps to avoid prejudice to Plaintiff by explaining to her the possible consequences of failing to  
 15 contact Peiffer Wolf or to meet discovery deadlines. Decl. ¶¶ 5-6. Decl. ¶ 5. Despite those efforts,  
 16 Plaintiff has failed to establish communication with Peiffer Wolf ¶ 5. Plaintiff has also failed to  
 17 provide Peiffer Wolf with sufficient or adequate information needed to meet her obligations under  
 18 PTO 31. ¶ 6. Peiffer Wolf has taken all reasonable steps to avoid foreseeable prejudice to Plaintiff.  
 19 Decl. ¶ 9.

20                  Under California Rule of Professional Conduct 1.16(b)(4), a lawyer may withdraw from  
 21 a case if “the client … renders it unreasonably difficult for the lawyer to carry out the  
 22 representation effectively.” Here, Plaintiff rendered it unreasonably difficult for Peiffer Wolf to  
 23 carry out the representation effectively by failing to communicate with Peiffer Wolf and failing  
 24 to provide information required to prosecute her case, despite requests from Peiffer Wolf. Decl.  
 25 ¶ 5. Therefore, Peiffer Wolf has been unable to meet discovery deadlines in this case.

26                  Because this motion is not accompanied by a substitution of counsel or an agreement by  
 27 Plaintiff to proceed *pro se*, Peiffer Wolf agrees to the condition imposed by Local Rule 11-5(b)  
 28 to serve Plaintiff with all papers in this matter, unless or until Plaintiff appears *pro se*, other

1 counsel appears on Plaintiff's behalf, or upon further order of the Court. Decl. ¶ 10.

2 **CONCLUSION**

3 Peiffer Wolf respectfully requests that the Court enter an order terminating its  
4 representation of Plaintiff and allowing Plaintiff 30 days to retain new counsel.

5 DATED: November 17, 2025

6 RESPECTFULLY SUBMITTED,

7 BY: */S/ RACHEL B. ABRAMS*  
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